

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

CARNEGIE MELLON UNIVERSITY,

Plaintiff,

v.

MARVELL TECHNOLOGY GROUP, LTD.,  
and MARVELL SEMICONDUCTOR, INC.,

Defendants.

Civil Action No. 2:09-cv-00290-NBF

**MARVELL'S MOTION FOR  
JUDGMENT AS A MATTER OF LAW OF NO WILLFUL INFRINGEMENT**

Defendants, Marvell Technology Group, Ltd. and Marvell Semiconductor, Inc.

(collectively, "Marvell") respectfully move the Court pursuant to Federal Rule of Civil Procedure 50(a) for judgment as a matter of law of no willful infringement. For the reasons stated in Marvell's Memorandum of Law in Support of this Motion for Judgment as a Matter of Law filed simultaneously herewith, the Court should grant Marvell judgment on CMU's claim of no willful infringement under Rule 50(a) and enter the proposed order attached hereto.

Dated: December 11, 2012

Respectfully submitted,

/s/ John E. Hall

/s/ Edward J. DeFranco

John E. Hall  
Timothy P. Ryan  
ECKERT SEAMANS CHERIN &  
MELLOTT, LLC  
U.S. Steel Tower  
600 Grant Street, 44th Floor  
Pittsburgh, PA 15219  
Phone: (412) 566-6000  
Fax: (412) 566-6099  
jhall@eckertseamans.com  
tryan@eckertseamans.com

Edward J. DeFranco (*pro hac vice*)  
Faith Gay (*pro hac vice*)  
Raymond Nimrod (*pro hac vice*)  
David Radulescu (*pro hac vice*)  
QUINN EMANUEL URQUHART & SULLIVAN, LLP  
51 Madison Avenue, 22<sup>nd</sup> Floor  
New York, New York 10010  
Phone: (212) 849-7000  
Fax: (212) 849-7100  
eddefranco@quinnemanuel.com

Steven G. Madison (*pro hac vice*)  
QUINN EMANUEL URQUHART & SULLIVAN, LLP  
865 S. Figueroa St., 10th Floor  
Los Angeles, California 90017  
Phone: (213) 443-3000  
Fax: (213) 443-3100  
stevemadison@quinnemanuel.com

Kevin P.B. Johnson (*pro hac vice*)  
QUINN EMANUEL URQUHART & SULLIVAN, LLP  
555 Twin Dolphin Drive., 5<sup>th</sup> Floor  
Redwood Shores, California 94065  
Phone: (650) 801-5000  
Fax: (650) 801-5100  
kevinjohnson@quinnemanuel.com

*Attorneys for Defendants, Marvell Technology Group,  
Ltd. and Marvell Semiconductor, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 11, 2012, the foregoing was filed electronically on ECF. I also hereby certify that on December 11, 2012, this filing will also be served on counsel for CMU by electronic mail.

/s/ John E. Hall

John E. Hall  
Timothy P. Ryan  
ECKERT SEAMANS CHERIN & MELLOTT, LLC  
U.S. Steel Tower  
600 Grant Street, 44th Floor  
Pittsburgh, PA 15219  
Phone: (412) 566-6000  
Fax: (412) 566-6099  
jhall@eckertseamans.com  
tryan@eckertseamans.com

David C. Radulescu (*pro hac vice*)  
QUINN EMANUEL URQUHART & SULLIVAN, LLP  
51 Madison Avenue, 22<sup>nd</sup> Floor  
New York, New York 10010  
(212) 849-7000 Telephone  
(212) 849-7100 Facsimile  
davidradulescu@quinnemanuel.com

*Attorneys for Defendants,  
Marvell Technology Group, Ltd. and  
Marvell Semiconductor, Inc.*